



Region 2 Enforcement & Compliance Assurance Division
Air Compliance Branch
CAA Inspection Report

Inspection Date: 9/12/2022

Facility Name: PC PUERTO RICO LLC, D/B/A, USVI FUEL SERVICES (PUMA ENERGY TERMINAL)

Facility Address: #8240 Subbase, St Thomas, U.S.V.I.

ICIS-Air ID #: VI0007800500108

Facility Contact: Averay Owen, Terminal Manager

EPA Lead Inspector: Ralph Lonergan, Environmental Engineer

EPA Asst. Inspector: Victor Tu, Environmental Engineer

State Inspector(s): Andrew Jackson, VIDPNR

Other Inspector(s): N/A

Pertinent Regulatory Requirements

- 40 CFR 60, Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.
- 40 CFR 60, Subpart XX – Standards of Performance for Bulk Gasoline Terminals.
- 40 CFR 63, Subpart BBBB – National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities.
- 40 CFR 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engine

Summary of Observations

Environmental Protection Agency (EPA) inspectors Ralph Lonergan and Victor Tu arrived at the Puma St. Thomas Terminal at approximately 14:00. The inspectors presented their credentials upon entry and proceeded to an opening conference with Averay Owen (Terminal Manager). Andrew Jackson of the VIDPNR was also present for the inspection. A safety briefing was presented during the opening conference. During the opening conference, Mr. Owen provided an overview of the operations at the facility. The facility has three internal floating roof tanks that store gasoline products: tanks 46, 54 and 57. The tanks receive product via barges approximately 1-2 times per month. Gasoline is loaded from the storage tanks to trucks via the facility's truck

rack. The truck rack has one gasoline bay that is controlled by a vapor combustion unit (VCU). Emissions during tank truck loading are conveyed to the VCU via an underground pipe.

The facility operates five days a week from 7:00-16:00 and is always manned during loading operations. Mr. Owen explained that trucks must check in with security before entering the facility. Tank trucks that are not up to date with the vapor tightness requirements are not allowed entry. Operators at the facility conduct a daily leak check of the piping at the loading rack area. Mr. Owen also explained that there were no more trucks scheduled to be on-site for the day.

The team then proceeded to conduct IR camera surveys of the facility's internal floating roof tanks. IR camera surveys were done for tanks 46, 54 and 57. The team observed minimal levels of emissions from all of the tanks, generally from the various fixed roof vents of the tanks. The inspectors planned with Mr. Owen to arrive the following morning to observe the loading of tank trucks. After a discussion on the expectations of the inspection, the inspection concluded for the day.

The following day, the inspectors arrived onsite at approximately 8:30 and proceeded for the facility tour. One truck was loading a mixture of gasoline and diesel. A survey with the infrared (IR) camera indicated no leaks at the connections to the vapor recovery system. The inspectors were unable to locate a pressure relief valve between the loading rack and the VCU. The VCU was operational during the loading, however the inspectors could not locate a temperature monitor to see what temperature the VCU operated at. Mr. Owen explained that the VCU turns on then the loading rack collects vapors and reaches a setpoint temperature for the required destruction efficiency. The temperature was verified during a stack test.

The field tour concluded at 11:00 and the EPA team and Puma representatives returned to the conference room for a closing meeting. Inspector Lonergan thanked the Puma representatives for accommodating the inspection. Inspector Lonergan provided a summary of the team's observations. Inspector Lonergan provided a summary of the team's observations and indicated that additional information and documents may be requested after the inspection.

Lead Inspector's Name: Ralph Lonergan, Environmental Engineer

11/17/2022

X Ralph Lonergan

Lead Inspector

Signed by: RALPH LONERGAN

Assisting Inspector's Name: Victor Tu, Environmental Engineer

11/18/2022

X Victor Tu

Assisting Inspector

Signed by: VICTOR TU

Supervisor's Name: Harish Patel

11/21/2022

X Harish Patel

Supervisor

Signed by: Environmental Protection Agency